

REMARKS

This paper is responsive to the Office Action mailed February 18, 2009. Upon entry of the present Amendment, claims 1-3 and 5-13 will have been amended. Applicants note that no prohibited new matter has been added. Thus, upon entry of this Amendment, claims 1-3 and 5-13 are under consideration by the Examiner, of which claim 1 is independent.

Information Disclosure Statements

The Examiner states that the Information Disclosure Statement (IDS) filed on April 30, 2007 failed to comply with the requirements under 37 C.F.R. § 1.98(a)(1) (Office Action, pg. 2), as the documents were not listed on a PTO-1449 Form. Applicants respectfully note that page 2 of the IDS submitted on April 30, 2007, states that the documents cited in the IDS submitted April 30, 2007 were previously made of record in the IDS filed on November 24, 2006. Thus, no PTO-1449 Form was provided, as to do so would have resulted in duplicate listings of the cited documents. To the extent that the documents were previously made of record by the IDS of November 24, 2006, Applicants respectfully request consideration of the documents submitted with the IDS of April 30, 2007.

Specification

The Examiner required an amendment to the title. Applicants note that the title has been amended in accordance with the Examiner's suggestion.

Claim Rejections – 35 U.S.C. § 112

The Office Action rejects claims 1-3 and 5-13 under 35 U.S.C. § 112, second paragraph, as being indefinite. Applicants respectfully note that the claims have been amended to even

further clarify the subject matter of the pending claims, paying particular attention to the concerns raised by the Examiner. The Examiner requested location of support for various features of the pending claims. Applicants respectfully submit that support for the features, such as “compose a memory map of the writing completion flag table” and a “factory shipment” setting is supported as having an initialization value of 0, is available throughout the specification, for example, at ¶¶ 0038, 0046, and 0052 of the filed specification. In view of the amendments, Applicants submit that the grounds for the 35 U.S.C. § 112, second paragraph rejection no longer exists and respectfully request withdrawal of this rejection.

Claim Rejections – 35 U.S.C. § 102

The Office Action rejects claims 1, 5, 9, and 10 under 35 U.S.C. § 102(e) as being anticipated by Kubo (JP 2001-005928). The Office alleges that Kubo teaches a semiconductor memory device comprising all the features of these claims.

A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). See *The Manual of Patent Examining Procedure* [hereinafter “MPEP”] § 2131. Applicants submit that the applied art does not show each and every element of the claimed invention. In particular, Applicants note that the applied art does not teach a writing completion flag provided to the main storage memory every second storage capacity smaller than said first storage capacity. Moreover, Applicants respectfully submit that table 23 in Kubo is improperly likened by the Examiner to the “write completion flag table” of the present invention.

Applicants note that Kubo discloses a first table 22 and the second table 23, wherein table 22 corresponds to the address conversion table 108 of the embodiment of the present invention. Applicants further note that the second table 23 in Kubo holds the statuses of the blocks of the flash memory 5. Applicants respectfully submit that "status" refers to whether the physical block is a valid state or an invalid state. Applicants submit that table 23 corresponds to the physical block status table 109 of Figure 4 of the present invention, and does not correspond to Applicants' write completion flag table.

Further, the Office Action asserts that Kubo teaches that the address management information storage includes a physical region management table and an address conversion table. Applicants submit that the write completion flag table of the present invention holds flags, and each flag shows whether or not the writing process has been completed. The address management information memory part of claim 1 corresponds to memory 110 of Applicants' disclosed embodiment (including tables 108 and 109). Applicants respectfully note that claim 1 has been amended to even further clarify the foregoing distinctions.

Claim Rejections – 35 U.S.C. § 103

The Office Action rejects claims 2-3 and 8 under 35 U.S.C. § 103(a) as being unpatentable over Kubo in view of Tanaka (U.S. 7,054,991).

The Office Action rejects claims 6 – 7 under 35 U.S.C. § 103(a) as being unpatentable over Kubo.

The Office Action rejects claims 11 – 13 under 35 U.S.C. § 103(a) as being unpatentable over Kubo in view of Rinerson (U.S. 6,917,539).

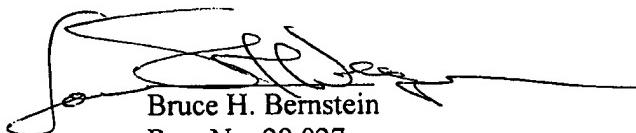
Applicants initially note that the claims rejected under 35 U.S.C. § 103 depend from claim 1. Applicants submit that neither Rinerson nor Tanaka disclose or suggest that which is lacking in Kubo; namely, the writing of a completion flag to the main storage memory, as discussed above. Thus, Applicants respectfully submit that claims 2-3, 6-8, and 11-13 are allowable at least for the reason that they depend from an allowable base claim and because they recite additional features that further define the present invention that are neither anticipated nor obvious over the cited documents. Accordingly, Applicants respectfully request withdrawal of the rejections of record.

CONCLUSION

For at least the foregoing reasons, it is respectfully submitted that all pending claims are patentably distinct over the documents employed in the rejection of record. Applicants request reconsideration and withdrawal of the rejections of record. Allowance of the application with an early mailing date of the Notices of Allowance and Allowability is therefore respectfully requested.

If there should be any questions, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully Submitted,
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